

# EXHIBIT

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
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*This document relates to:*

*Burnett, et al. v. Islamic Republic of Iran*, No. 15-cv-9903 (GBD)(SN)

**DECLARATION OF RHONDA MCCLEARY**

I, Rhonda McCleary, hereby declare under penalty of perjury as follows:

1. I am currently 51 years of age and reside in Peoria, Arizona.
2. I am the stepdaughter of James ("Jim") Durward Cleere, who was killed in the September 11, 2001 terrorist attacks at the World Trade Center in New York. James was a guest staying at the Marriott Hotel located at that facility.
3. I was approximately ten years old when my mother married James and we began living together as a family.
4. My mother and my biological father were divorced when I was five years old and my biological father remarried shortly thereafter. I did not see him often after that.
5. Growing up, I was supposed to spend every other weekend with my biological father. However, he would often cancel. Generally, I would only see my biological father at Christmas.
6. I remember as a young girl asking James Cleere if I could call him "dad." Thereafter on Father's Day, I would seek out cards to give him that referred to him as "dad" or "father," not as "stepdad" or "stepfather."
7. A memory I have of Jim which has special meaning for me occurred shortly before I gave birth to my son. My mother was hospitalized for a minor surgery and Jim and I went

shopping together for a camcorder so he could record and document the arrival and development of his grandson. We then went to lunch together. After I gave birth to my son, and as my husband, my parents and I emerged from the hospital with my newborn son in arms, there was Jim recording the "outing" of his new grandson. My son always referred to Jim as his grandfather, and Jim always referred to my son as his grandson.

8. Jim was the father who showed up for my school activities and took an active part in my early education. He was the father who showed up for family breakfast together.

9. The father-daughter relationship that developed in my life was between myself and James Cleere, not between my biological father and myself.

10. James Cleere nurtured me, clothed me, fed me, sheltered me and kept me safe. James Cleere taught me right from wrong and provided emotional support throughout my formative years.

11. I continuously resided in our family home with James and my mother until I was approximately 20 years old.

12. James Cleere was my father in all ways but name.

I declare under penalty of perjury that the foregoing is true and correct.

Date: 8-11-19

Rhonda McCleary  
Rhonda McCleary